

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Call One Inc.)	
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)	
Application to expand Call One's existing)	Docket No. _____
certificates of local and interexchange)	
authority to include authority to operate as a)	
facilities-based carrier of telecommunications)	
services in the State of Illinois)	

MOTION FOR PROTECTIVE ORDER

Call One Inc. ("Call One"), by its representatives and pursuant to 83 Ill. Admin. Code § 200.430, files this Motion for Protective Order ("Motion") in the above-captioned proceeding and submits a proposed draft order. By this Motion, Call One seeks confidential treatment by the Illinois Commerce Commission (the "Commission") of certain commercially sensitive financial information required to be attached to its application to expand Call One's existing certificates of local and interexchange authority to include authority to operate as a facilities-based carrier of telecommunications services in the State of Illinois. In support of this Motion, Call One states as follows:

I. Description of Confidential Information.

1. Call One is applying for authority to offer facilities-based telecommunications services. Section III.1. of the Application for Certificate to Become a Telecommunications Carrier ("Application") requires Call One to attach documentation of its financial resources and ability to provide services. In conformity with this requirement, Call One intends to submit as Exhibit F to its Application, its financial statements, including its 2013 and 2014 balance sheets, statements of income and retained earnings, and statements of cash flow, as well as its 2013 and

2014 schedules of costs of sales, operating, general, and administrative expenses. This material, provided solely for the purpose of review within this proceeding, contains highly confidential and strictly proprietary information, the public disclosure of which may result in direct, immediate and substantial harm to Call One's competitive position in Illinois and elsewhere.

II. Grounds for Claim of Confidential Treatment Pursuant to Protective Order.

2. Call One is a private corporation formed under the laws of Illinois. As such, it is not required to publicly disclose, and in fact, does not disclose, its financial information. The financial statements which Call One intends to attach as Exhibit F are not readily available to persons external to Call One, and are not shared with most Call One employees. In fact, these documents were sent to undersigned counsel directly from Call One's CFO, Martha Zayas.

3. Because the financial statements submitted by Call One in support of its Application contain confidential and commercially sensitive information from which its competitors may derive economic value, Call One seeks to protect such material from public disclosure. Call One derives independent economic value from the fact that significant, detailed and proprietary information regarding the nature and structure of its financial resources is unknown to its competitors. The disclosure of this information could provide an unfair and undeserved competitive advantage to existing and potential competitors, and could injuriously and unnecessarily disadvantage Call One. The sole purpose for which these materials are provided—to allow the Commission to make a determination as to Call One's financial qualifications for the requested grant of authority—does not require nor justify such harm.

4. In addition, Section 7(g) of the Illinois Freedom of Information Act, 5 ILCS 140/1 *et seq.*, exempts from public disclosure “trade secrets and commercial or financial information obtained from a person or business where such trade secrets or information are proprietary,

privileged, or confidential, or where disclosure of such trade secrets or information may cause competitive harm.” The financial information which Call One intends to attach as Exhibit F to Call One’s Application falls within this exemption and should therefore remain confidential.

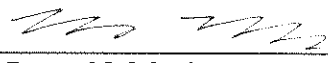
5. Call One requests that its financial statements remain confidential for a period of five years from the date they are submitted.

Conclusion

For the reasons stated above, Call One respectfully requests that the Illinois Commerce Commission grant this Motion and adopt the proposed Protective Order with respect to the financial information Call One intends to submit as Exhibit F to its Application, for a period of **five years** from the date of submission.

Respectfully submitted,

Call One Inc.

By: 
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